

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 13
KEITH AARON STEED)	CASE: A17-66058-CRM
)	
)	
DEBTOR)	

**CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION
AND MOTION TO DISMISS CASE**

COMES NOW, Nancy J. Whaley, the Standing Chapter 13 Trustee herein, and objects to Confirmation of the plan for the following reasons:

1.

The Debtor has failed to provide to the Trustee a copy of the 2016 tax return filed with Internal Revenue Service in violation of 11 U.S.C. Section 521(e)(2)(A).

2.

Question number sixteen (16) of Debtor's Statement of Financial Affairs is incomplete in violation of 11 U.S.C. Section 521(a)(1) and Bankruptcy Rule 1007(b)(1).

3.

The proposed plan does not include the revised local plan language for the payment of Attorney's Fees pursuant to General Order No. 18-2015. Further, the Rule 2016(b) Disclosure Statement fails to contain an assignment from the Debtor to his attorney for funds to be paid for attorney's fees upon pre-confirmation dismissal or conversion.

4.

The Chapter 13 plan proposes to pay \$4500.00 to the Debtor's attorney for payment of attorney fees. The Trustee is unable to determine whether this is a reasonable fee and requests that Debtor's counsel appear at Confirmation and be prepared to present evidence to the Court regarding the reasonableness of the requested fee.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of the Debtor's plan, and to dismiss the case.

This the 3rd day of November, 2017.

Respectfully submitted,

/s/

Nancy J. Whaley
Standing Chapter 13 Trustee
State Bar No. 377941

CERTIFICATE OF SERVICE

Case No: A17-66058-CRM

This is to certify that I have this day served the following with a copy of the foregoing Chapter 13 Trustee's Objection To Confirmation And Motion To Dismiss Case by depositing in the United States mail a copy of same in a properly addressed envelope with adequate postage thereon.

Debtor(s)

KEITH AARON STEED
1254 CHAPEL DR SW
MARIETTA, GA 30064-3912

Attorney for the Debtor(s):

REIDY LAW FIRM
3330 CUMBERLAND BLVD.
SUITE 500
ATLANTA, GA 30339

This the 3rd day of November, 2017.

/s/ _____

Nancy J. Whaley
Standing Chapter 13 Trustee
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